

**UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE AT KNOXVILLE, TENNESSEE**

PAMELA C. PHIBBS,

Plaintiff

vs.

**REVENUE RECOVERY
CORPORATION &
BUFFALOE & VALLEJO, PLC,**

No. 3:16-cv-00156
(Phillips/Guyton)

Defendants

**DEFENDANT REVENUE RECOVERY CORPORATION'S
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Defendant Revenue Recovery Corporation ("RRC") respectfully moves this Honorable Court for an order granting it a summary judgment and dismissing the First Amended Complaint ("Amended Complaint") filed by Plaintiff Pamela C. Phibbs ("Plaintiff"), with prejudice. Because there are no genuine issues of material fact remaining for trial, and reasonable minds can only conclude that RRC is entitled to judgment as a matter of law, a summary judgment in RRC's favor should be entered. The reasons for this Motion are set forth more fully in the attached Memorandum, along with the deposition excerpts, affidavit, discovery responses, and other materials referenced in and made attachments to the contemporaneously filed Memorandum.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing document has been served this 24th day of March, 2017, upon all counsel or parties as listed below at interest in this cause by delivering a true and exact copy to the offices of said counsel or parties or by placing a copy in the United States mail addressed to said counsel or parties at his/her office, with sufficient postage to carry it to its destination, or by special overnight courier; if the foregoing document has been electronically filed with the Court, this service has been made only upon counsel or parties to whom the Court does not furnish electronic copies of filings.

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